



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

October 3, 2019

BY ECF

Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

**Re: *United States v. Mark S. Scott,*
S8 17 Cr. 630 (ER)**

Dear Judge Ramos:

The Government submits this letter on behalf of the parties to address the pre-trial schedule in the above-captioned case, which is set for trial on November 4, 2019. The Government and defense counsel propose the following pre-trial schedule and respectfully request that the Court So Order the schedule set forth below:

- **October 7:** Government expert notice disclosure
- **October 14:** Defense expert notice disclosure; Government Rule 404(b) notice; and Government completes its rolling production of 3500 material¹
- **October 18:** Parties simultaneously file motions *in limine* and proposed examinations of jurors. Government files its request to charge
- **October 21:** Government produces witness list and exhibits pursuant to prior Court order
- **October 23:** Defense response to Government's request to charge
- **October 25:** Simultaneous motions *in limine* responses

¹ The Government produced its first set of 3500 material on August 29, 2019, and has produced the majority of its anticipated 3500 material as of the date of this letter. The Government has agreed with defense counsel to make a good faith effort to continue producing 3500 material and to produce available 3500 material by October 14.

- **October 28:** Final pretrial conference pursuant to prior Court order; defense disclosure of exhibits and witnesses (including 3500 material for defense witnesses)

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

By: /s/
Christopher J. DiMase / Nicholas Folly/
Julieta V. Lozano
Assistant United States Attorneys /
Special Assistant United States Attorney
(212) 637-2433 / (212) 637-1060/
(212) 335-4025

Cc: David Garvin, Esq.
Arlo Devlin Brown, Esq.